

June 20, 1988

MEMORANDUM

SUBJECT: Proposed Changes to EER Reporting under 40 CFR 60.7

FROM: Jon Knodel *JK*  
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TO: State Coordinators

On September 29, 1987, in accord with an agreement negotiated between SSCD and OMB, the agency proposed rules (52 FR 36440) to reduce the frequency of EER reporting from NSPS sources.

In short, the proposal establishes three categories of reporting:

- quarterly for Subpart D, Da, and Db sources, with "negative declaration" for no excess emissions (no change from present)
- quarterly for surface coating facilities (EE,MM,RR,SS,TT,WW,HHH) with excess emissions, otherwise a semi-annual "negative declaration" statement (sources previously required to report monthly only if monthly emission limitation exceeded. No negative declaration required.)
- semi-annual for all other NSPS (G,H,J-except SO2,P,Q,R,Z,AA, BB,CC,GG,HH, and NN) previously reporting quarterly. Continued semi-annual reporting from sources already reporting semi-annually (VV, etc.)

On June 17, 1988, Region VII received a DRAFT FINAL document, which if promulgated, formalizes these reporting requirements. A copy of the document is available for review. Although the CEM workgroup (not necessarily Region VII) has strong objections to the reduced reporting requirements, it appears the regulation will be finalized.

In spite of regional disagreement on the changes, two pluses from opening the 60.7 wound include a requirement for a source to report its operating time, and inclusion of a summary EER form.

If you feel Region VII should formally comment on the changes, please let me know. In the meantime, please inform your state of the proposed reporting changes and request that they make comments if they feel strongly about the changes.